

---

**From:** Antonio Ortiz <[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)>  
**Sent:** Monday, April 26, 2021 1:10 PM  
**To:** Marty Schwartz <[mschwartz@schainbanks.com](mailto:mschwartz@schainbanks.com)>  
**Cc:** Chrystal Madden <[cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)>  
**Subject:** Re: 2021DCV-1521-A; Maxim Crude Oil, LLC v Noil Corp., Inc., et al.

Marty,

See attached TRO entered by the District Court in Nueces County, Texas, restraining and enjoining your clients, Noil Corp., Inc. and Steve Neely, or any other party in possession of the funds wired to Noil's bank account by Maxim (which you confirmed were still in Noil's account) from:

- Disposing of any of the funds in their possession; and
- Destroying, altering, hiding or secreting any and all documents evidencing the funds, including documents relating to the transfers or expenditures of the funds.

The Order also mandates that your clients enjoin to safeguard all the funds in your control, pending further order from the court, and orders that any act or conduct, including the entry by your clients into any contract to accomplish any act in violation of the TRO shall be void and of no force and effect.

The court has set the injunction hearing for May 5, 2021 at 1:30 p.m.

Please immediately forward a copy of this TRO to your client. In the meantime if you'd like to discuss a resolution to this matter, please let me know.

Regards,

--

***Antonio Ortiz***

***Jordan, Holzer & Ortiz P.C.***

**Phone: (361) 884-5678**

**Fax: (361) 888-5555**

**Cell: 956-495-9969**

**E-mail: [aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)**

***Austin, Brownsville, Corpus Christi***



**Jordan,  
Holzer  
& Ortiz, P.C.**



This e-mail and any attached files may be confidential and subject to attorney/client privilege. If you received it in error, please immediately notify the sender by return e-mail or by calling (361) 884-5678.

---

**From:** Antonio Ortiz <[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)>

**Date:** Monday, April 26, 2021 at 8:45 AM

**To:** Marty Schwartz <[mschwartz@schainbanks.com](mailto:mschwartz@schainbanks.com)>

**Cc:** Chrystal Madden <[cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)>

**Subject:** Re: 2021DCV-1521-A; Maxim Crude Oil, LLC v Noil Corp., Inc., et al.

Marty,

I'm following up on my email below regarding accepting service on behalf of your client(s). On a similar note, please confirm for me whether or not your client's position has changed. In other words, please let me know if your client will agree to return the balance of the funds Maxim wired.

Regards,

--

***Antonio Ortiz***

***Jordan, Holzer & Ortiz P.C.***

**Phone: (361) 884-5678**

**Fax: (361) 888-5555**

**Cell: 956-495-9969**

**E-mail: [aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)**

***Austin, Brownsville, Corpus Christi***



Jordan,  
Holzer  
& Ortiz, P.C.



This e-mail and any attached files may be confidential and subject to attorney/client privilege. If you received it in error, please immediately notify the sender by return e-mail or by calling (361) 884-5678.

---

**From:** Antonio Ortiz <[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)>

**Date:** Friday, April 23, 2021 at 3:15 PM

**To:** Marty Schwartz <[mschwartz@schainbanks.com](mailto:mschwartz@schainbanks.com)>

**Cc:** Chrystal Madden <[cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)>

**Subject:** 2021DCV-1521-A; Maxim Crude Oil, LLC v Noil Corp., Inc., et al.

Marty,

See attached petition and application for TRO that was filed today. Please let me know if you'll agree to accept service on behalf of your clients. In the meantime if there's anything you'd like to discuss please don't hesitate to call or write.

Regards,

--

***Antonio Ortiz***

***Jordan, Holzer & Ortiz P.C.***

**Phone: (361) 884-5678**

**Fax: (361) 888-5555**

**Cell: 956-495-9969**

**E-mail: [aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)**

***Austin, Brownsville, Corpus Christi***



Jordan,  
Holzer  
& Ortiz, P.C.



This e-mail and any attached files may be confidential and subject to attorney/client privilege. If you received it in error, please immediately notify the sender by return e-mail or by calling (361) 884-5678.